



Shenoa Payne <[spayne@paynelawpdx.com](mailto:spayne@paynelawpdx.com)>

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**Re: Pitkin - BON complaints [IWOV-pdx.FID3663076]**

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John Coletti <[john@paulsoncoletti.com](mailto:john@paulsoncoletti.com)>

Thu, Oct 19, 2017 at 5:47 PM

To: "Hansen, Richard" <[RHansen@schwabe.com](mailto:RHansen@schwabe.com)>

Cc: "Tim Jones (tim@timjonespc.com)" <[tim@timjonespc.com](mailto:tim@timjonespc.com)>, "Talcott, Anne" <[ATalcott@schwabe.com](mailto:ATalcott@schwabe.com)>, Shenoa Payne <[spayne@paynelawpdx.com](mailto:spayne@paynelawpdx.com)>

We will go ahead file the motion tomorrow on both issues and if you're position on producing the depositions changes you can let me know.

I will be taking her deposition. Can you remind me what all she has been designated for other than the contract? Thanks.

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On Oct 19, 2017, at 5:39 PM, Hansen, Richard <[RHansen@SCHWABE.com](mailto:RHansen@SCHWABE.com)> wrote:

John,

I am going to have to continue Corizon's objection to producing its submissions to the Oregon BON. Investigations by the Board are confidential. As is the identity of the complainant. Layer that on the policy reasons and I just cannot agree to produce the documents you have requested related to the Board of Nursing.

As I mentioned last night, I will get to you on the issue of the *Green* transcripts after I speak with my client tomorrow.

Who is going to be taking Debbie Fye's deposition next week?

Dick

**Richard K. Hansen**|Shareholder

**Schwabe Williamson & Wyatt**

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